

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA AT  
ANCHORAGE

2018 JUN 31 PM 3:22  
BY: DEPUTY CLERK  
CLERK TRIAL COURTS

JANE DOE  
Plaintiff(s),

Vs.

Justin Scott Schneider  
Defendant(s).

Case No. 3AN-18-10422 CI  
**ANSWER**

Defendant, Justin Scott Schneider, hereby submits this Answer to the Complaint on file herein, and alleges and avers as follows:

1. Paragraph 1 of the Complaint call for a legal conclusion and therefore no response is necessary.
2. Paragraph 1 of the Complaint call for a legal conclusion and therefore no response is necessary.
3. Defendant is without information sufficient to admit or deny the allegations in Paragraph 3 of the Complaint.
4. Defendant admits the allegation in paragraph 4 of the Complaint.
5. Defendant is without information sufficient to admit or deny the allegations in Paragraph 5 of the Complaint.
6. Defendant denies the allegations in paragraph 6 of the Complaint.
7. Defendant denies misleading Jane Doe to enter the vehicle and go with him. Defendant denies misleading Jane Doe regarding the destination. Defendant admits to attacking and strangling Jane Doe. The defendant denies Jane Joe becoming unconscious.
8. Defendant denies Jane Doe becoming unconscious. Defendant admits to tackling, strangling, and ejaculating on Jane Doe.
9. Defendant admits returning to work and family. As to the remainder of the allegations, Defendant is without information sufficient to admit or deny the remaining allegations in paragraph 9 of the Complaint.
10. Defendant denies the allegations in paragraph 10 of the Complaint.
11. Defendant is without information sufficient to admit or deny the allegations in Paragraph 11 of the Complaint.
12. Defendant admits the allegations in paragraph 12 of the Complaint.
13. Paragraph 13 of the Complaint is argumentative and incorrect. Defendant spent nearly a month in jail and then was released on bail and with third-party

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custodians. The terms of the order or release speak for themselves. Defendant is without information or belief sufficient to admit or deny whether the Office of the Attorney General made these decisions without input from plaintiff.

14. Defendant is without information sufficient to admit or deny the allegations in Paragraph 14 of the Complaint.

15. Defendant is without information sufficient to admit or deny the allegations in Paragraph 15 of the Complaint.

16. Defendant is without information sufficient to admit or deny the allegations in Paragraph 16 of the Complaint.

17. Defendant denies the allegations in paragraph 17 of the Complaint.

18. Paragraph 18 of the Complaint is argumentative. The terms of the plea agreement speak for themselves.

19. Defendant is without information sufficient to admit or deny the allegations in Paragraph 19 of the Complaint.

20. Defendant admits the allegations in paragraph 20 of the Complaint.

21. Defendant is without information sufficient to admit or deny the allegations in Paragraph 21 of the Complaint.

22. Defendant realleges and incorporates all his prior responses herein.

23. Defendant denies the allegations in paragraph 23 of the Complaint.

24. Defendant is without information sufficient to admit or deny the allegations in Paragraph 24 of the Complaint.

25. Defendant realleges and incorporates all his prior responses herein.

26. Defendant admits the allegations in paragraph 26 of the Complaint.

27. Defendant is without information sufficient to admit or deny the allegations in Paragraph 27 of the Complaint.

28. Defendant is without information sufficient to admit or deny the allegations in Paragraph 28 of the Complaint.

29. Defendant realleges and incorporates all his prior responses herein.

30. Defendant admits the allegations in paragraph 30 of the Complaint.

31. Defendant realleges and incorporates all his prior responses herein.

32. Defendant is without information sufficient to admit or deny the allegations in Paragraph 28 of the Complaint.

33. Paragraph 1 of the Complaint call for a legal conclusion and therefore no response is necessary. To the extent that the paragraph requires a response, defendant denies the allegations.

### AFFIRMATIVE DEFENSES

1. Failure to state a claim upon which relief may be granted.
2. To the extent that Plaintiff received any compensation for the same injuries asserted in the *Complaint* from collateral sources that do not have a right of subrogation by law or contract, Defendant is entitled to introduce evidence of said collateral benefits pursuant to the provisions of AS 09.17.070 or are entitled to an offset for the same.
3. To the extent that Plaintiff received any compensation for the same injuries asserted in the *Complaint* from collateral sources that do have a right of subrogation by law or contract, and which have instructed Plaintiff not to pursue subrogation for them, such expenses must be deducted from any recovery Plaintiff receive.
4. Plaintiff's claimed damages, appear in part to have been caused by the action of the Attorney General as reference in the *Complaint* and therefore, were the result of the conduct of others and fault should be allocated pursuant to AS 09.17.080.

Answering Defendant reserves the right to assert such other and further affirmative defenses that may become available as discovery progresses.

### PRAYER FOR RELIEF

WHEREFORE, Defendant prays for the following relief:

1. That Plaintiffs' *Complaint* be dismissed with prejudice or grant Plaintiff a reduced amount based upon the admissions, denials and affirmative defenses as alleged above herein;
2. That Defendant be awarded costs and fees incurred in defending this action; and,
3. That Defendant be awarded such other and additional relief as the Court deems appropriate.

Dated this 31st day of December, 2018,



Defendant